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17 Attorneys for Plaintiff  
18 ROBERT VALLADON

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA

21 ROBERT VALLADON,  
22 Plaintiff,  
23 v.  
24 CITY OF OAKLAND,  
25 Defendants.

Case No. C06-7478 SI

**STIPULATION AND ORDER EXTENDING  
EXPERT DISCOVERY DEADLINE AND  
MOTION HEARINGS FOR  
DEFENDANT'S MOTIONS REGARDING  
GROUPS N-P AND GROUP Q**

26 WHEREAS, the non-expert discovery and expert deadlines in this matter is currently set  
27 for March 20, 2009;

28 WHEREAS, the Defendant has filed three motions regarding Groups N-P (exemptions),  
Group Q (compensatory time off), and Groups A and E-1 (donning and doffing), which are  
currently set for hearing on April 24, 2009;

1 WHEREAS, the parties have met and conferred to schedule expert and non-expert  
2 depositions in this matter;

3 WHEREAS, the parties have agreed to set several depositions after March 20, 2009;

4 WHEREAS, one of the experts (scheduled for April 8) is expected to testify about issues  
5 relevant to Group Q and one of the experts (scheduled for March 31 or April 4) is expected to  
6 testify about issues relevant to Groups N-P;

7 WHEREAS, the Defendant has agreed to waive the 3-day service requirement for  
8 electronic filing as to Plaintiffs' Oppositions to Defendant's Motions regarding Groups N-P  
9 (exemptions) and Group Q (compensatory time off);

10 WHEREAS, the Plaintiffs have agreed to waive the 3-day service requirement for  
11 electronic filing as to Defendant's Replies to Plaintiffs' Oppositions to Defendant's Motions  
12 regarding Groups N-P (exemptions) and Group Q (compensatory time off);

13 WHEREAS, all parties agree to be bound by the terms of the stipulation and order;

14 NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

15 1. The expert discovery cut-off deadline will be moved to April 10, 2009;

16 2. Subject to witness availability, Plaintiffs will be permitted to take the depositions  
17 of three fact witnesses (Vicki Laden, Caryl Casden, and Leticia Gonzales) after the non-expert  
18 discovery cut-off deadline (March 20) as long as the depositions are completed before the expert  
19 discovery cut-off deadline (April 10);

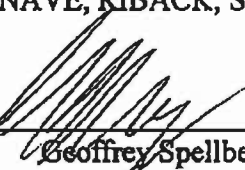
20 3. The Defendant's Motions regarding Groups N-P (exemptions) and Group Q  
21 (compensatory time off) will be set for hearing on May 1, 2009;

22 4. Plaintiffs' Oppositions to Defendant's Motions regarding Groups N-P  
23 (exemptions) and Group Q (compensatory time off) will be electronically filed on April 10,  
24 2009; and


25 5. Defendant's Replies to Plaintiffs' Oppositions to Defendant's Motions regarding  
26 Groups N-P (exemptions) and Group Q (compensatory time off) will be electronically filed on  
27 April 17, 2009; and  
28

6. Any party may apply to the Court for an amendment to any provision herein,  
based upon a showing of good cause.

Dated: March 11, 2009 MEYERS, NAVE, RIBACK, SILVER & WILSON


By:   
Geoffrey Spellberg  
Attorney for Defendant  
City of Oakland

Dated: March 13, 2009 AITCHISON & VICK

By:   
Breanne Sheetz  
Attorney for Plaintiffs  
Robert Valladon

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

  
HON. SUSAN ILLSTON  
UNITED STATES DISTRICT COURT